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7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 MAINE STATE RETIREMENT SYSTEM,
11 Individually and On Behalf of All Others
Similarly Situated,

12 Plaintiff,

13 v.
14 COUNTRYWIDE FINANCIAL
CORPORATION, *et al.*

15 Defendants.

No. 2:10-CV-00302 MRP
(MAN)

CLASS ACTION

16
17
18 DECLARATION OF JULIE
19 GOLDSMITH REISER IN
20 SUPPORT OF PLAINTIFFS'
21 OPPOSITION TO BANK OF
22 AMERICA CORPORATION
23 AND NB HOLDING
24 CORPORATION'S MOTION
25 TO DISMISS

26 Date: October 18, 2010
27 Time: 11:00 a.m.
Courtroom: 12
Judge: Hon. Mariana R.
Pfaelzer

28 No. 2:10-cv-00302: DECLARATION OF JULIE GOLDSMITH REISER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO BANK OF AMERICA CORPORATION AND NB
HOLDING CORPORATION'S MOTION TO DISMISS

1 **DECLARATION OF JULIE GOLDSMITH REISER**

2 I, Julie Goldsmith Reiser, declare as follows:

3 1. I am a partner of the law firm of Cohen Milstein Sellers & Toll PLLC,
4 Lead Counsel for the Class, and am admitted *pro hac vice* to practice before this
5 Court. I submit this declaration and accompanying exhibits in support of
6 Plaintiffs' Opposition to Bank of America Corporation and NB Holding
7 Corporation's Motion to Dismiss.

8 2. Attached hereto are true and correct copies of the following
9 documents:

10 Exhibit A: Bank of America Corporation Press Release, April 27, 2009;

11 Exhibit B: Rick Rothacker, *BofA Exec Tackles Countrywide*, Charlotte
12 Observer (Oct. 21, 2008);

13 Exhibit C: Bank of America Corporation's Form 11-K, filed June 26,
14 2009;

15 Exhibit D: Shayndi Raice and Marshall Eckblad, *Countrywide's Mess
Billed to Bank of America*, Dow Jones Newswires (June 7,
16 2010);

17 Exhibit E: Julie Creswell, *Bank of America Joins Parade of Mortgage-
Related Losses*, New York Times (Jan. 23, 2008);

18 Exhibit F: Bank of America Countrywide Acquisition Announcement Call
19 Transcript, January 11, 2008;

20 Exhibit G: Amy Miller, *Countrywide in Crosshairs as Mortgage Crisis
Fuels Litigation*, Corporate Counsel (Feb. 22, 2008);

21 Exhibit H: Testimony of Brian T. Moynihan to Financial Crisis Inquiry
22 Commission (Jan. 13, 2010);

Exhibit I: *MBIA Ins. Corp. v. Countrywide Home Loans, Inc.*, No. 602825/08 (N.Y. Apr. 29, 2010);

Exhibit J: *Argent Classic Convertible Arbitrage Fund L.P. v. Countrywide Financial Corporation*, No. 07-cv-07097-MRP (MANx) (C.D. Cal. Mar. 19, 2009).

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Dated: September 16, 2010

Julie Goldsmith Reiser

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No. 2:10-cv-00302: DECLARATION OF JULIE GOLDSMITH REISER IN SUPPORT OF PLAINTIFFS' OPPOSITION TO BANK OF AMERICA CORPORATION AND NB HOLDING CORPORATION'S MOTION TO DISMISS

1 **PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO**
2 **CENTRAL DISTRICT OF CALIFORNIA LOCAL RULES**
3 **AND ECF GENERAL ORDER NO. 10-07**

4 I, the undersigned, say:

5 I am a citizen of the United States and am employed in the office of a member
6 of the Bar of this Court. I am over the age of 18 and not a party to the within action.
7 My business address is 1801 Avenue of the Stars, Suite 311, Los Angeles, California
8 90067.

9 On September 16, 2010, I caused to be served the following document:

10 1. **OPPOSITION TO BANK OF AMERICA CORPORATION AND NB**
11 **HOLDING CORPORATION'S MOTION TO DISMISS**

12 2. **DECLARATION OF JULIE GOLDSMITH REISER IN SUPPORT OF**
13 **PLAINTIFFS' OPPOSITION TO BANK OF AMERICA**
14 **CORPORATION AND NB HOLDING CORPORATION'S MOTION**
15 **TO DISMISS**

16 By posting the document to the ECF Website of the United States District Court
17 for the Central District of California, for receipt electronically by the parties as
18 listed on the attached Service List.

19 And on any non-ECF registered party:

20 **By Mail:** By placing true and correct copies thereof in individual sealed
21 envelopes, with postage thereon fully prepaid, which I deposited with my
22 employer for collection and mailing by the United States Postal Service. I am
23 readily familiar with my employer's practice for the collection and processing of
24 correspondence for mailing with the United States Postal Service. In the ordinary
25 course of business, this correspondence would be deposited by my employer with
26 the United States Postal Service that same day.

27 I certify under penalty of perjury under the laws of the United States of
28 America that the foregoing is true and correct. Executed on September 16, 2010,
29 at Los Angeles, California.

30 s/Michael Goldberg
31 Michael Goldberg

Mailing Information for a Case 2:10-cv-00302-MRP -MAN**Electronic Mail Notice List**

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Manual Notice List

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